

6(d) Estimating the Respondent Universe and Total Burden and Cost

EPA estimates that the total number of respondents to the 2003 Biennial Report will be approximately 20,356, which annualized over the two-year report cycle equals 10,178 per year.³ We considered other methods of estimating the number of responses (such as looking at the number of respondents in past Biennial Reports, but the numbers fluctuated, and we could not develop projections).

The number of respondents and forms for each respondent activity is presented below. These estimates assume that all questions and forms are submitted in accordance with the Biennial Report instructions. Exhibit 1 calculates the annual respondent burden and cost for the activities examined.

Read the Instructions

EPA estimates that all 20,356 respondents will read the instructions to the 2003 Biennial Report. Annualized over the two-year report cycle, this results in 10,178 facilities reading the instructions each year.

Gather Information and Prepare Site Identification Form

EPA estimates that all 20,356 respondents will prepare and submit a Site Identification Form with the 2003 Biennial Report. Annualized over the two-year report cycle, this results in 10,178 respondents preparing and submitting a Site Identification Form each year. EPA further assumes that 50 percent of forms will be pre-populated by States, in which case respondents need only review and update the data. Respondents receiving blank forms will need to complete the form. EPA estimates that, on average, a pre-populated Site Identification Form will take about 0.5 hours to update and a blank Site Identification Form will take about 0.7 hours to prepare. Thus, on average, EPA assumes each respondent will take about 0.6 hours (weighted-average) to update/prepare a Site Identification Form.

Gather Information and Prepare Form GM

EPA anticipates that each year 10,178 respondents will submit 116,901 GM Forms to EPA. EPA estimates that, on average, a Form GM will take about 1.26 hours to prepare manually and 0.08 hours to prepare electronically. EPA further assumes that 30 percent of forms will be prepared manually and 70 percent will be prepared electronically. Thus, on average, EPA assumes each respondent will take about 0.43 hours (weighted-average) to prepare each Form GM.

³ The annual number of respondents for the 2003 Biennial Report (10,178) is based on the total number of large quantity generators responding to the 2001 Hazardous Waste Report (i.e., 20,356 divided by 2).

Gather Information and Prepare Form WR

EPA expects that each year 272 (543/2) respondents will each submit a total of 377,172 Forms WR to EPA.⁴ Note that the number of WR Forms represents the number of blocks on Form WR that have been completed; the paper form actually contains three blocks of the same WR information (i.e., the same questions, repeated three times on the same page). EPA estimates that a Form WR will take, on average, about 1.31 hours to prepare manually and 0.13 hours to prepare electronically. EPA further assumes that 10 percent of forms will be prepared manually and 90 percent will be prepared electronically. Thus, on average, EPA assumes each respondent will take about 0.25 hours (weighted-average) to prepare each Form WR.

Gather Information and Prepare Form OI

Because this form is a State-optional form, EPA does not expect any facilities to submit Form OI and therefore does not calculate the burden for this form.

Submit the Biennial Report to State/Region

EPA expects each respondent, 10,178 facilities per year, to submit the report to the appropriate State or Region.

Maintain a Copy of Each Form

EPA expects facilities to retain an estimated 505,251 (10,178 + 116,901 + 377,172) forms each year.

6(e) Bottom Line Burden and Cost Tables

Respondent Tally

Exhibit 3 presents the bottom line respondent burden and costs associated with the 2003 Biennial Report. EPA estimates that respondents will incur an annual burden of 196,976 hours and a cost of \$10,311,438. Exhibit 3 also presents cost estimates by type (labor, capital/startup, or O&M) as well as two-year totals for burden and costs (to reflect the overall burden and costs incurred by respondents over the two-year period covered by this ICR).

⁴ The annual number of respondents submitting 2001 Forms WR (272) is based on the total number of respondents submitting Forms WR for the 1997 Biennial Report (i.e., 543/2).

EXHIBIT 3**THE 2003 BIENNIAL REPORT****TOTAL ESTIMATED RESPONDENT BURDEN AND COST SUMMARY (FROM EXHIBIT 1)**

	Burden	Labor Cost	Capital/ Startup Cost	O&M Cost	Total Cost
Annual Total	196,976	\$10,286,102	\$0	\$25,336	\$10,311,438
2-Year Total	393,952	\$20,572,204	\$0	\$50,673	\$20,622,877

Agency Tally

Exhibit 4 presents the bottom line Agency burden and costs associated with the 2003 Biennial Report. EPA estimates an Agency annual burden of 232,820 hours and a cost of \$7,750,798. Exhibit 4 also presents cost estimates by type (labor, capital/startup, or O&M) as well as two-year totals for burden and costs (to reflect the overall burden and costs incurred by the Agency over the two-year period covered by this ICR).

EXHIBIT 4**THE 2003 BIENNIAL REPORT****TOTAL ESTIMATED AGENCY/STATE BURDEN AND COST SUMMARY (FROM EXHIBIT 2)**

	Burden	Labor Cost	Capital/ Startup Cost	O&M Cost	Total Cost
Annual Total	232,820	\$7,750,798	\$0	\$370,236	\$8,121,034
2-Year Total	465,640	\$15,501,596	\$0	\$740,471	\$16,242,067

6(f) Reasons For Change In Burden

As shown in Exhibit 3, the overall (two-year) burden estimate for the 2003 Hazardous Waste Report is 393,952 hours. Based on reported data for the 2001 Hazardous Waste Report, EPA estimates a slight increase of 3,524 hours from the estimated burden of the 2001 Hazardous Waste Report (390,428 hours).

This change in burden has occurred for several reasons. Based on reported data for the 2001 Hazardous Waste Report, EPA estimates a slight increase in the number of respondents, an additional 42; we estimate the increase in the number of submitted forms to be 15,218. The completion of the RCRA Subtitle C Site Identification Form will require an estimated additional 20 minutes. This has resulted in a minor increase of 2% in the time to complete the report.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 19.35 hours per response. The annual reporting burden is estimated to average 16.87 hours per response including time for reviewing instructions, gathering data, completing and reviewing the forms, and submitting the report. The annual recordkeeping

requirement is estimated to average 2.48 hours per respondent including the time for filing and storing the Biennial Report submission for three years.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number RCRA-2002-0024, which is available for public viewing at the RCRA Docket in the EPA Docket Center (EPA/DC), EPA West, Room B102, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the RCRA Docket is (202) 566-0270. An electronic version of the public docket is available through EPA Dockets (EDOCKET) at <http://www.epa.gov/edocket>. Use EDOCKET to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID Number RCRA-2002-0024 and OMB Control Number 2050-0024 in any correspondence.